

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

<b>NATIONAL LABOR RELATIONS BOARD,</b>	:	
	:	Consolidated Case No.
Appellant,	:	2:14-cv-01725(CCC)
	:	
v.	:	
	:	Appeal from Bankr. Case No.
<b>710 LONG RIDGE ROAD OPERATING CO.</b>	:	13-13653(DHS)
<b>II, LLC, et al.,</b>	:	
	:	
Appellees	:	

**NATIONAL LABOR RELATIONS BOARD’S APPLICATION FOR A 7-  
DAY EXTENSION OF TIME TO REPLY**

The National Labor Relations Board (“Board”) hereby makes application with the Court for a 7-day extension of time for the parties to file their supplemental reply briefs. In support of this application, the Board states as follows:

1. On August 15, 2013, the Court issued a letter order [ECF 241] establishing a briefing schedule for the parties’ supplemental briefs and replies on the legal and factual issues presented by Appellees Motion to Dismiss ordering, inter alia, that supplemental reply briefs be due by no later than October 20, 2023.

2. No previous extension has been obtained for this matter. The Board’s request is made due to the unavailability of counsel by the original deadline, due to the press of urgent business. In particular, the NLRB’s Contempt, Compliance and

Special Litigation Branch must file an expedited appellate brief in *Leslie ex rel. NLRB v. Starbucks*, 2d Cir. No. 23-1194, by October 19, 2023, a case under 28 U.S.C. § 1292(b) involving refusal to issue a preliminary injunction. Due to the expedited status of that case, no extension of time to file may be obtained.

3. On September 20, 2023, counsel for the Board, Paul Thomas, informed counsel for the Appellees and for the New England Health Care Employees Union (the “Union”) of the Board’s intent to file the instant application. The Union has consented to the Board’s request for this extension of time and Appellees do not object.

WHEREFORE, the Board respectfully submits this application with the Court requested to extend the time for the parties to file their supplemental reply briefs to October 27, 2023. A proposed order is attached herewith.

Respectfully submitted,

PAUL A. THOMAS  
*Supervisory Attorney*  
(202) 273-3788  
[paul.thomas@nrlrb.gov](mailto:paul.thomas@nrlrb.gov)

/s/ Matheus Teixeira  
MATHEUS TEIXEIRA  
*Trial Attorney*  
(202) 273-2959  
[matheus.teixeira@nrlrb.gov](mailto:matheus.teixeira@nrlrb.gov)

National Labor Relations Board  
Contempt, Compliance,  
& Special Litigation Branch  
1015 Half Street, SE, 4<sup>th</sup> Floor  
Washington, DC 20570

Dated: October 6, 2023  
Washington, D.C.

### **CERTIFICATE OF SERVICE**

I hereby certify that on October 6, 2023 a true and correct copy of the NLRB's Application for an Extension of Time was filed with this Court using the CM/ECF system, and that a copy is being served on ECF Filers electronically by the Notice of Docket Activity.

/s/ Matheus Teixeira

MATHEUS TEIXEIRA

*Trial Attorney*

(202) 273-2959

matheus.teixeira@nlrb.gov